

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	
	)	
TAKE-TWO INTERACTIVE SOFTWARE, INC.,	)	
2K GAMES, INC.; 2K SPORTS, INC.; WORLD	)	Case No. 3:18-cv-966-MJR-DGW
WRESTLING ENTERTAINMENT, INC.;	)	
VISUAL CONCEPTS ENTERTAINMENT;	)	
YUKE’S CO., LTD.; AND YUKE’S LA, INC.,	)	
	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR ENTRY OF AMENDED SCHEDULING ORDER**

Plaintiff Catherine Alexander (“Plaintiff”) and Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., Visual Concepts Entertainment, World Wrestling Entertainment, Inc., Yuke’s Co., Ltd., and Yuke’s LA, Inc. (collectively “Defendants,” and together with Plaintiff, the “Parties”), by and through their attorneys, hereby jointly move this Court for entry of the Proposed Amended Scheduling Order submitted herewith as **Exhibit A** and to adjourn the trial date in this litigation to a date of the Court’s convenience after September 1, 2019. In support of this motion, the Parties state as follows:

1. On August 7, 2018, this Court entered a scheduling order in this case. *See* Dkt. No. 54.
2. In the scheduling order, the Court set the following dates:
  - (a) Plaintiff’s and Defendants’ depositions shall be taken by November 1, 2018. Dkt. No. 54, ¶ 3.

(b) Disclosure of, and written reports by, Defendants' experts pursuant to Federal Rule of Civil Procedure 26(a)(2) shall occur by December 13, 2018. *Id.* ¶ 5.

(c) Depositions of Plaintiff's expert witnesses must be taken by December 6, 2018. *Id.* ¶ 6.

(d) Depositions of Defendants' experts must be taken by January 7, 2019. *Id.*

(e) Discovery shall be completed by January 7, 2019. *Id.* ¶ 8.

(f) All dispositive motions shall be filed by January 21, 2019. *Id.* ¶ 9.

3. Due to certain discovery-related issues, as well as the Parties' pending motions, the Parties have not been able to conduct necessary depositions. In addition, the approach of the holidays over the next month adds difficulty to the Parties' ability to schedule those depositions by the January 7, 2019 close of discovery set in the scheduling order.

4. Accordingly, the Parties respectfully request that the Court enter an order extending the above deadlines by approximately three months to allow for full and complete discovery. The Parties have met and conferred and agree to the dates set forth in the Proposed Amended Scheduling Order. Moreover, the Parties agree that this extension would be beneficial to all Parties, as there are numerous motions pending before the Court, the resolution of which may affect the course of discovery.

5. The Parties are aware that the Local Court Rules require that discovery must be completed no later than 115 days before the first day of the month of the presumptive trial month, and all dispositive motions must be filed no later than 100 days before the first day of the month of the presumptive trial month. Under the Proposed Amended Scheduling Order, this would place the trial date on or after September 1, 2019. Thus, the Parties respectfully request

that the trial date in this litigation be adjourned to a date of the Court's convenience after September 1, 2019.

WHEREFORE, for the reasons stated herein, the Parties respectfully request that this Court enter the Proposed Amended Scheduling Order, attached hereto as **Exhibit A**, to adjourn the trial date in this litigation to a date of the Court's convenience after September 1, 2019.

Dated: December 5, 2018

**THE SIMON LAW FIRM, P.C.**

/s/ Anthony G. Simon (with consent)

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VISUAL CONCEPTS ENTERTAINMENT;  
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Defendants.

Case No. 3:18-cv-966-MJR-DGW

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2018, I electronically filed the foregoing  
**Unopposed Motion for Entry of Amended Scheduling Order** with the Clerk of the Court  
using the CM/ECF system, which will send notification of such filing to the following:

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Entertainment, Yuke's Co., Ltd., and Yuke's LA, Inc.*